

## **REMARKS**

This is a full and timely response to the outstanding final Office Action mailed September 24, 2007. Reconsideration and allowance of the application and pending claims are respectfully requested.

### **I. Claim Rejections - 35 U.S.C. § 112, Second Paragraph**

Claim 23 has been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. Specifically, it is argued in the final Office Action that the phrase "of the computer that is separate from the printing device driver and its user interface" is indefinite. In response, Applicant notes that the Examiner is passing judgment of only a portion of the complete limitation contained in claim 23. The complete limitation provides as follows:

the print quality support information being contained in one or more web pages that can be displayed in a network browser of the computer that is separate from the printing device driver and its user interface.

From the above, it is clear that the limitation describes web pages that can be displayed in a "network browser" that is separate from the printing device driver and its user interface. Therefore the term "separate" modifies the term "network browser", not the term "computer". Accordingly, the limitation is both clear and consistent with Applicant's original disclosure.

In view of the above, it is respectfully submitted that claim 23 defines the invention in the manner required by 35 U.S.C. § 112. Accordingly, Applicant respectfully requests that the rejection be withdrawn.

## **II. Claim Rejections - 35 U.S.C. § 102(b)**

Claims 1-4, 6, 7, 14, 17-19, and 21-23 have been rejected under 35 U.S.C. § 102(b) as being anticipated *Venkatraman, et al.* ("Venkatraman," U.S. Pat. No. 5,956,487). Applicant respectfully traverses.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

In the present case, not every feature of the claimed invention is represented in the Venkatraman reference. Applicant discusses the Venkatraman reference and Applicant's claims in the following.

### **A. The Venkatraman Disclosure**

Venkatraman discloses embedding a web access mechanism in an appliance or "device" 10. *Venkatraman*, Patent Title, column 3, lines 51-61. As summarized by Venkatraman:

A solution for providing widely accessible, low cost, and enhanced user interface functions for a device is disclosed. The solution involves embedding web access functionality into the device including a web server that provides a device web page. The device includes an embedded network interface that enables access to the device web page by a web browser. A user of the web browser accesses the user interface functions for the device through the device web page. The web server functionality may be implemented with existing circuitry in a device, such as an exiting processor, memory, and input/output circuitry that normally perform device-specific functions, thereby avoiding the extra cost and space required for dedicated web server hardware for the device.

*Venkatraman*, column 2, lines 13-26.

Venkatraman further discloses that the device 10 can comprise a printer (*Venkatraman*, column 3, lines 51-52) and that the web browser 40 executes on a separate “computer system” (*Venkatraman*, column 5, lines 51-52). Therefore, Venkatraman can be said to disclose a printer having an embedded web server that serves web pages to a separate computer system. The web pages are used by the computer system to “access the user interface functions” of the printer. See *Venkatraman*, column 5, lines 29-31. Therefore, control is exercised by the computer system over the printer using the web pages and not through use of a “driver” program that resides on the computer system.

## **B. Applicant's Claims**

As is noted above, Venkatraman fails to teach several of Applicant's claim limitations. Applicant discusses some of those claim limitations in the following.

### **1. Claims 1-4, 6, and 6**

Applicant's independent claim 1 provides as follows:

1. A method for providing print quality support relative to a printing device, the method comprising:

executing a printing device driver on a computer so as to present a printing device driver user interface to a user on the computer, the printing device driver comprising a program stored on the computer that is used to control operation of a peripheral device separate from the computer;

presenting a link to print quality support in the printing device driver user interface on the computer; and

providing print quality support information to the user in a network browser separate from the printing device driver interface on the computer when the link is selected by the user.

Regarding claim 1, Venkatraman does not teach "executing a printing device driver on a computer". Instead, Venkatraman discloses a system in which a device 10, such as a printer, serves to a computer system web pages that are used to access functions of the device.

In the final Office Action, the Examiner alleged that Venkatraman teaches "executing a printing device driver on a computer" in column 7, line 21 and column 3, line 14. This is not true. First, regarding line 21 of column 7 of the Venkatraman reference, Venkatraman only states that a web page 18 served by the device 10 can

include hyperlinks that reference “updated software driver routines”. *Venkatraman*, column 7, lines 15-22. A disclosure of a web page that references drivers is *not* a teaching of “executing” a driver on a “computer”. Second, regarding column 3, line 14, Venkatraman merely identifies a “client” that can receive the web pages served by the device 10. Therefore, that excerpt also does not discuss “executing” a “driver” on a “computer”.

Venkatraman also does not teach a printing device driver “comprising a program stored on the computer that is used to control operation of a peripheral device separate from the computer”. Simply stated, Venkatraman does not describe a computer or computer system that stores a driver program that is used to control the device 10. Applicant notes that the Examiner has failed to explicitly identify a portion of the Venkatraman disclosure in which such a teaching is contained. See Final Office Action, page 3, lines 2-4. For at least that reason, the rejection is improper and should be withdrawn.

Venkatraman further does not teach presenting a link to print quality support “in the printing device driver user interface”. Although Venkatraman may be said to generally teach presenting a link in a user interface served by the device 10, such a link is not provided in “the printing device driver user interface”, i.e., an interface supported by the previously recited “driver” that executes and is stored “on the computer”. Again, Venkatraman discloses no such driver. Instead, Venkatraman’s computer system computer system is only described as receiving web pages in a web browser 40.

For at least the above reasons, it is respectfully submitted that claim 1 and its dependents are allowable over the Venkatraman reference.

## 2. Claims 14, 17, and 18

Applicant's independent claim 14 provides as follows:

14. A computer comprising:  
a processing device; and  
memory that stores a printing device driver that is used to operate and control a separate printing device; a printing device driver user interface configured to support interaction between a user and the printing device driver; and logic associated with the printing device driver user interface that is configured to enable provision to the user of information regarding print quality issues retrieved from a network.

Regarding claim 14, Venkatraman does not teach "a computer" that "stores a printing device driver that is used to operate and control a separate printing device" at least for reasons described above in relation to claim 1. Again, Venkatraman does not describe a device driver that is stored on a computer. Instead, in Venkatraman's system, interface pages that are used to access the functions of a device 10 are served to a computer system using an embedded server of the device.

For similar reasons, Venkatraman does not teach "a computer" that "stores" a "printing device driver user interface" configured to support interaction between a user and the printing device driver. Again, Venkatraman discloses no device driver that is stored on a computer.

In addition, Venkatraman does not teach "logic associated with the printing device driver user interface that is configured to enable provision to the user of information regarding print quality issues retrieved from a network". Although Venkatraman's

device 10 may be said to comprise such logic, Venkatraman's computer system clearly does not.

For at least the above reasons, it is respectfully submitted that claim 14 and its dependents are allowable over the Venkatraman reference.

### 3. **Claim 23**

Applicant's independent claim 23 provides as follows:

23. A system comprising:

a printing device; and

a computer in communication with the printing device, the computer comprising a printing device driver configured to operate and control the printing device and a printing device driver user interface configured to support interaction between a user and the printing device driver, wherein the printing device driver is configured to present links to print quality support information regarding the printing device, the print quality support information being contained in one or more web pages that can be displayed in a network browser of the computer that is separate from the printing device driver and its user interface.

Regarding claim 23, Venkatraman does not teach "a computer" in communication with a printing device, the computer comprising "a printing device driver configured to operate and control the printing device" at least for reasons described above.

In addition, Venkatraman does not teach "a computer" comprising "a printing device driver user interface configured to support interaction between a user and the printing device driver" also for reasons described above.

Given that Venkatraman does not teach a computer comprising a resident device driver, it logically follows that Venkatraman does not teach “wherein the printing device driver is configured to present links to print quality support information regarding the printing device, the print quality support information being contained in one or more web pages that can be displayed in a network browser of the computer that is separate from the printing device driver and its user interface”.

For at least the above reasons, it is respectfully submitted that claim 23 is allowable over the Venkatraman reference.

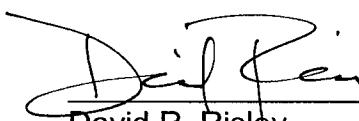
### **III. Canceled Claims**

Claims 5, 8-13, 15, 16, and 20 have been canceled from the application without prejudice, waiver, or disclaimer. Applicant reserves the right to present these canceled claims, or variants thereof, in continuing applications to be filed subsequently.

## CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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